



Frontier Airlines, Inc.
4545 Airport Way
Denver, Colorado 80239

February 15, 2022

Federal Aviation Administration
U.S. Department of Transportation
Docket Management System
1200 New Jersey Avenue,
SE West Building Ground Floor
Room W12-140
Washington, DC 20590

Subject: Petition for Exemption Re: 14 CFR121.339(c), Emergency equipment for extended over-water operations.

Dear Madam/Sir:

In accordance with the Code of Federal Regulations, 14 CFR § 11.61, § 11.63 and § 11.81, Frontier Airlines petitions the Administrator for a limited exemption from 14 CFR §121.339 (c) which requires survival kits to be attached to each life raft. Frontier petitions for inclusion under Exemption 17291 (Regulatory Docket No. FAA-2017-0329).

Model A319/A320/A321 aircraft manufactured by Airbus have door escape slides that also serve as life rafts, and in accordance with §121.339(c), survival equipment should be attached to the life raft. However, the door slide compartments are limited by size, and the survival kits required for ditching/extended overwater approval will not fit into the same compartment as the door escape slide. Relief from this requirement would allow Frontier Airlines to stow survival kits in the overhead bin close to each exit.

Background

The FAA issued Equivalent Level of Safety (ELOS) Memo# TD00839IB-TCI-14 against 14 CFR §25.1415(c) for the A318/A319/A320/A321, which allows survival kits to be stowed near the required floor-level exits due to the space constraints of the slide bustles.

The survival kits are immediately available to flight attendants seated at the exit. This ELOS is noted in the Type Certificate Data Sheet (TCDS) number A28NM, Rev 47. 4545 Airport Way, Denver Colorado, 80249.

Request for Expedited Consideration Frontier further requests that, as part of this Petition for Exemption request, the public comment phase be waived as per Title 14 CFR Part 11.87(a), which states: "The FAA may not publish a summary of your petition for exemption and request comments if you present or we find good cause why we should not delay action on your petition. The factors we consider in deciding not to request comment include: (a) Whether granting your petition would set a precedent..."

It is the opinion of Frontier Airlines that granting the relief from 14 CFR §121.339 (c) does not set a precedent.

No Adverse Effect on Public Safety and Public Interest

The conditions and circumstances, in regard to public interest and equivalent levels of safety, which warranted the granting this Exemption continue to exist. Frontier's training program and Flight Attendant



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Manual (FAM) contains diagrams with survival equipment locations in addition to procedures for its use in the event of ditching.

Summary for Federal Register

14 CFR §121.339(c) states: "A survival kit, appropriately equipped for the route to be flown, must be attached to each required life raft." On the A319/A320/A321 aircraft, door escape slides also serve as life rafts; therefore, survival equipment should be attached to the life raft as required by 14 CFR §121.339(c). However, the location and size of the door compartments on the A318/A319/A320/A321 is limited, and the survival kits required for ditching/extended overwater approval will not fit at the same location as the door escape slide. Frontier is seeking relief from §121.339(c) in order to stow A319/A320/A321 survival kits in a remote location.

Conclusion

Based on the information provided in this petition, granting Frontier Airlines relief on the Airbus A318/A319/A320/A321 as permitted by ELOS noted in the Type Certificate Data Sheet (TCDS) number A28NM, Rev 47 will allow Frontier Airlines to continue to provide a useful device that benefits the commercial aviation industry and the flying public.

If any further information or discussion is required, please contact me at (720) 212-6459.

Sincerely,

Jim W Colburn

Captain Jim Colburn

Director of Operations

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FlyFrontier.com

